

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 2:23cr135

MARIA REICH,

Defendant.

MOTION TO MODIFY

COMES NOW the defendant, Maria Reich, by counsel, and moves this Honorable Court to modify the conditions of her release to suspend payments in the amount of \$2,000.00. In support thereof, Ms. Reich submits the following:

1. On November 27, 2023, Ms. Reich made her initial appearance before the Honorable Lawrence R. Leonard, United States Court Magistrate Judge, and her conditions of release were set. This Honorable Court directed Ms. Reich to “reimburse the Government at the rate of \$2,000.00 per month once sale of home is completed.” “Payments to begin 1/1/24 and continue each month thereafter until paid in full.” ECF No. 6.
2. On December 19, 2023, the Honorable Lawrence R. Leonard endorsed a Warrant to Seize Property Subject to Forfeiture for net proceeds from sale of the real property in the amount of \$176,878.53.
3. The sale of Ms. Reich’s home has been completed, and the total due to seller was \$26,987.77. \$176,878.53 was seized pursuant to the aforementioned Warrant to Seize Property Subject to Forfeiture.

WHEREFORE, in light of the fact that Ms. Reich did not net the entire proceeds from the sale of said real property, it is respectfully requested that this Honorable Court modify and suspend Ms. Reich's obligation to make a monthly reimbursement to the Government in the amount of \$2,000.00.

Respectfully submitted,

MARIA REICH

By: /s/
Of Counsel

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CERTIFICATE OF SERVICE

I certify that on this 22nd of January 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

_____/s/_____

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